

ATTACHMENT 29

JOINT DECLARATION OF JAY M. BRADBURY
AND SHARON E. NORRIS

**FLORIDA OSS TEST
OPEN OBSERVATIONS AND EXCEPTIONS
AS OF JULY 10, 2002**

	Observations	Exceptions	Total
<u>Order Management</u>			
Functional Testing	4	4	8
Volume Testing	1	-	1
Flow-through	-	3	3
Order Management Total	5	7	12
<u>Provisioning</u>	-	3	3
<u>Relationship Mgmt.</u>			
Change Management	-	2	2
Interface Development	1	1	2
Relationship Mgmt. Total	1	3	4
<u>Billing</u>	1	1	2
<u>Performance Measures</u>			
Definitions and Standards	-	-	-
Data Integrity	-	9	9
Calculation Verification	8	4	12
Performance Measures Total	8	13	21
Total Open Observations and Exceptions	15	27	42

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ORDER MANAGEMENT

	E/O	Test	Date opened	Description
				<i>PRE-ORDERING/ORDERING FUNCTIONAL TEST</i>
1	E-16	TVV-1	(3/5/01)	BST business rules for ordering (9K) do not offer the ability to submit an order for the partial migration of customer's UNE loops.
2	O-49	TVV-1	(3/13/01)	BST does not provide time stamps for LSRs for clarifications and completion notices via LENS.
3	O-87	TVV-1	(6/29/01)	The LENS interface does not support orders requesting to move a CLEC account outside of the end user's location.
4	O-127	TVV-1	(10/15-01)	BST does not provide complete FOC or CN responses to to xDSL service requests submitted through LENS.
5	E-161	TVV-1	(04/23/02)	KPMG has not received timely non-mechanized rejects from BellSouth.
6	E-162	TVV-1	(04/26/02)	BST's ordering documents provide inadequate instructions on how to submit orders for Centrex. (Formerly O-164)
7	E-165	TVV-1	(05/16/02)	BellSouth provides inconsistent and incorrect information on clarification responses for resale, UNE-P, and loop service requests.
8	O-198	TVV-1	(05/22/02)	BST provides inconsistent date and time stamps on FOC responses for LSRS submitted via LENS.

				<i>VOLUME TEST</i>
1	O-199	TVV2	(05/20/02)	KPMG has not received timely responses for loop make-up pre-order queries submitted via TAG.
				<i>FLOW-THROUGH</i>
1	E-121	TVV3	(11/13/01)	KPMG could not identify flow-through FOCs on LNP Service Requests submitted electronically via the mechanized ordering process.
2	E-122	TVV3	(11/13/01)	BST did not provide flow-through classification information for DSL orders submitted by KPMG.
3	E-136	TVV3	(01/15/02)	KPMG did not receive flow-through FOCs on UNEs submitted electronically via the mechanized ordering process.

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PROVISIONING, REPAIR AND MAINTENANCE

	E/O	Test	Date	Description
				<i>PROVISIONING</i>
1	E-84	TVV4	(7/10/01)	BST failed to use the proper codes when provisioning switch translations.
2	E-139	TVV4	(01/24/02)	BST's line loss report does not provide enough detail for CLECs to properly identify account activity.
4	E-171	TVV4	6/14/02	BST systems or representatives have not consistently updated the directory databases as specified in orders submitted by KPMG.

RELATIONSHIP MANAGEMENT

	E/O	Test	Date	Description
				<i>CHANGE MANAGEMENT</i>
1	E-88	PPR1	(07/20/01)	BST Change Control Process does not allow CLECs to prioritize all Change Requests that affect CLEC business.
2	E-123	PPR1	(12/05/01)	BellSouth is not classifying change requests as defects in accordance with the BellSouth definition of a defect.
				<i>INTERFACE DEVELOPMENT</i>
1	O-148	PPR-5	(12/05/01)	BellSouth does not apply system fixes to defects to all production versions of the OSS interfaces.
2	E-157	PPR-5	(03/04/02)	BellSouth fails to follow its software testing and quality processes.

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BILLING

	E/O	Test	Date	Description
1	O-202	TVV10	(05/31/02)	BST's publicly available documentation contains different target billing dispute resolution intervals and invalid web-site links.
2	E-172	TVV11	(06/14/02)	BST bills reflect a SO mechanized rate charge that is inconsistent with the rate contained in the ICA between BST and KPMG.

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PERFORMANCE MEASURES

	E/O	Test	Date	Description
				<i>DEFINITIONS AND STANDARDS</i>
				<i>DATA INTEGRITY</i>
1	E-36	PMR4	(3/21/01)	BST does not properly construct the processed data used to validate FOC and rejection timeliness (former observation-6).
2	E-113	PMR4	(10/4/01)	KPMG has found that BST does not capture xDSL transactions in flow-through measure.
3	E-114	PMR4	(10/5/01)	BellSouth incorrectly excludes data between the BARNEY Snapshot database and NODS stages of the PMAP process for FOCs for June 2001 data.
4	E-120	PMR4	(11/13/01)	BellSouth incorrectly excludes data between the BARNEY Snapshot database and NODS stages of the PMAP process for fully and partially mechanized orders for the % rejected service requests (non-trunks).
5	E-143	PMR4	(02/04/02)	BST incorrectly excludes data between BARNEY and NODS stages of the PMAP process for non-mechanized orders for % rejected service requests non-trunks for June 01 data.
6	E-144	PMR4	(02/04/02)	BST incorrectly excludes data between BARNEY and NODS stages of the PMAP process for non-mechanized orders for reject interval - non-trunks for June 01 data
7	E-145	PMR4	(02/04/02)	BST incorrectly excludes data between BARNEY and NODS stages of the PMAP process for non-mechanized orders for FOC Timeliness - non-trunks for June 01 data
8	E-174	PMR4	(6/25/02)	Values of the Completion Date Filed were inconsistent when comparing the Legacy/source extracts to the corresponding RADS snapshots for the WFAF system for data used in the calculation of certain Provisioning related SQMs.
9	E-175	PMR4	(6/26/02)	BST incorrectly excludes records during transfer of data between the Legacy extracts for the EDI system and the corresponding RADS Snapshots for February 2002 data.

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				<i>METRICS CALCULATION/REPLICATION</i>
1	E-124	PMR-5	(12/05/01)	KPMG cannot replicate the values in the flow through report for November 2000.
2	E-151	PMR-5	(02/22/02)	KPMG cannot replicate the values in the # completions/attempts without notice or with less than 24 hours notice measure. RDUM instructions insufficient. (Previously observation 139)
3	E-153	PMR-5	(02/22/02)	KPMG cannot replicate the values in: the Provisioning LNP Total Service Order Cycle Time measurement report. (Previously observation 113)
4	O-176	PMR-5	(03/19/02)	KPMG cannot replicate the values in the Average Completion Notice Interval.
5	O-185	PMR-5	(04/23/02)	KPMG cannot replicate the values in the Hot Cut Timeliness % within interval and average interval
6	O-195	PMR-5	(04/26/02)	KPMG cannot replicate the values in the Reject Interval SQM report for the CLEC aggregate (September 2001).
7	E-163	PMR-5	(05/06/02)	KPMG cannot replicate the values in the LNP % rejected service requests metric (Formerly Observation 179)
8	O-200	PMR-5	(05/20/02)	KPMG has found that BST's implemented exclusions for the LNP reject interval and % reject metrics are inconsistent with the documented exclusions.
9	O-204	PMR-5	(06/06/02)	KPMG cannot replicate the values in the FOC SQM for the Test CLEC (January 2002)
10	O-206	PMR-5	(06/17/02)	KPMG cannot replicate the values in the Mean Held Order Interval for August 2001.
11	O-207	PMR-5	(06-28-02)	KPMG cannot replicate the values in the Acknowledgement Message Timeliness metric for April 2002.
12	O-208	PMR-5	(07/09/02)	KPMG cannot replicate the values in the E-911 Mean Interval SQM for April 2002.

ATTACHMENT 30

JOINT DECLARATION OF JAY M. BRADBURY
AND SHARON E. NORRIS

Florida Public Service Commission

BellSouth Telecommunications, Inc.
OSS Evaluation Project

Draft Final Report
Version 1.0

Submitted by:

 **KPMG Consulting**

June 21, 2002

criteria were not satisfied. The evaluation criteria that are not satisfied are primarily in the areas of change management and release management.

3.0 Pre-Ordering and Ordering

The Pre-Order and Order domain evaluation was developed to test the systems, processes, and other operational elements associated with BellSouth's support for Pre-Order and Order activities for wholesale operations. The test examined functionality, compliance with measurement agreements, and comparable systems supporting BellSouth retail operations. Pre-Order and Order consisted of five tests, of which three were transaction-oriented and two were process-oriented. KPMG Consulting evaluated 110 evaluation criteria. One hundred six evaluation criteria were satisfied. Three evaluation criteria were not satisfied and one evaluation criterion is testing in progress. The evaluation criteria that are not satisfied are primarily in the areas of flow-through performance and accuracy of responses. The evaluation criterion that is testing in progress is in the area of new Centrex ordering capability.

4.0 Provisioning

The Provisioning domain evaluation was designed to review the systems, processes, and other operational elements associated with BellSouth's provisioning activities used for wholesale markets. The test examined functionality, compliance with measurement agreements, and comparable systems supporting BellSouth retail operations. Provisioning consisted of three tests, of which one was transaction-oriented and two were process-oriented. KPMG Consulting evaluated 113 evaluation criteria. One hundred two evaluation criteria were satisfied. Four evaluation criteria were not satisfied. Seven evaluation criteria remain testing in progress at this time. The evaluation criteria that are not satisfied are in the areas of directory listing, switch translation and intercept messaging. The evaluation criteria that are testing in progress are in the areas of line loss reporting and high capacity circuit provisioning and are pending the receipt of retail data in order to complete high capacity circuit provisioning parity analysis.

5.0 Maintenance and Repair

The primary objective of the M&R domain test was to determine whether adequate procedures, documentation and systems exist to allow an ALEC to identify, report, manage, and resolve troubles encountered with BellSouth supplied network elements. M&R consisted of eight tests, of which five were transaction-oriented. KPMG Consulting evaluated 100 evaluation criteria. All 100 evaluation criteria were satisfied at the time of data collection. However, as a result to the passage of time since data collection, KPMG Consulting is unable to assess the current performance of the underlying systems/or processes associated with 52 evaluation criteria.

6.0 Billing

The Billing domain included tests of both billing procedures and actual bills generated by the Customer Record Information System (CRIS), Carrier Access Billing System (CABS), and Integrated Billing Solution (Tapestry/IBS) systems. Billing consisted of five tests, of which two were transaction-oriented. KPMG Consulting evaluated 87 evaluation criteria. Eighty-one evaluation criteria were satisfied. Six evaluation criteria remain testing in progress at this time. The evaluation criteria that are testing in progress are in the area of UNE rate accuracy.

7.0 Performance Metrics Reporting

Test Reference	Evaluation Criteria	Result	Comments
			<p>initiated in any change request. Therefore BellSouth was not providing documentation of system defects. As a result, KPMG Consulting issued Exception 123.</p> <p>BellSouth responded that the defects had been identified, but BellSouth had failed to initiate Change Requests in the CCP for each issue. BellSouth provided documentation entitled Type 6 Defect Notification Process as well as a job aid, which describes the internal processes for identifying, managing, and resolving Type 6 defects in accordance with the Change Control Process. BellSouth has trained internal personnel on this process and provided them with both the Type 6 Defect Notification Process documentation and the relevant job aide End-To-End Process and Type 6 Job Aid.</p> <p>KPMG Consulting reviewed this documentation and found that the defect process is in place and documented. KPMG Consulting is conducting a retest to ensure Type 6 defects are now initiated in accordance with the Change Control Process and BellSouth internal procedures. This is addressed by Criteria 1-6 below. Exception 123 remains open pending conclusion of the retest.</p> <p>Through review of documentation produced by the Change Control Team and attendance at CCP meetings, KPMG Consulting was able to verify that the change management process is in place as documented in the Change Control Process, version 3.1</p>
PPR1-3	The change management process has a framework to evaluate, categorize, and prioritize proposed changes.	Not Satisfied	<p>The change management process does not have a complete framework to evaluate, categorize and prioritize Change Requests. KPMG Consulting conducted interviews with the Change Control Team, Change Review Board, and the Release Management Team.</p> <p>During an interview with the Change Control Team on June 12, 2000, KPMG Consulting found that the change management process for evaluating, categorizing and prioritizing Change Requests was defined in the Change Control Process, version 1.5.</p> <p>KPMG Consulting also conducted interviews with the CRB on October 18, 2000 and April 26, 2001. KPMG Consulting found that the CRB process had a framework for evaluation and</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>categorization of Change Requests. The CRB has no role in the prioritization process. KPMG Consulting reviewed the BellSouth End-to-End Process Flow, version 1.0, to ensure that the CRB process for evaluating and categorizing Change Requests was included.</p> <p>KPMG Consulting conducted an interview with the Release Management Team April 26, 2001. KPMG Consulting found that portions of the release management process did not provide a framework for the evaluation, categorization, and prioritization of Change Requests that allowed ALECs the ability to prioritize, assess the impact of, and plan resources for all Change Requests affecting the ALEC community. As a result, KPMG Consulting issued Exception 88.</p> <p>KPMG Consulting conducted a refresh interview with the Change Control Team October 8, 2001. KPMG Consulting verified that the Change Control Process, version 3.1, was implemented and provided a framework for the evaluation, categorization, and prioritization of Change Requests.</p> <p>KPMG Consulting conducted a refresh interview with the CRB on October 11, 2001. KPMG Consulting confirmed that the CRB followed the previously reviewed process and provided a framework for the evaluation and categorization of Change Requests. This process is documented in the BellSouth End-to-End Process Flow, version 1.0.</p> <p>KPMG Consulting conducted a refresh interview with the Release Management Team on October 9, 2001. KPMG Consulting confirmed that the Release Management Team continued to follow the previously reviewed processes and verified that the framework for the evaluation, categorization, and prioritization of Change Requests did not provide ALECs with the ability to prioritize, assess the impact of, and plan resources for all Change Requests affecting the ALEC community.</p> <p>On May 1, 2002, BellSouth provided a response to Second Amended Exception 88. The response proposed that BellSouth would implement a new Change Control Prioritization Process. The proposal stated that BellSouth would implement all Type 2 and Type 6 Change Requests as the</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>highest priority in all future releases. The proposal further stated that BellSouth would use the remaining release capacity, after Type 2 and 6 Change Requests had been scheduled, to schedule Type 3, 4 and 5 Change Requests. The proposal stated that this remaining capacity would be split equally between BellSouth and CLECs with CLECs receiving half of the remaining releases in which to prioritize and implement Change Requests. BellSouth would repeat this process with the other half of the remaining releases.</p> <p>On June 10, 2002, BellSouth provided a draft of the End-To-End Process Flow, version 2.1. KPMG Consulting reviewed the documentation and conducted an interview regarding this process with BellSouth on June 11, 2002. KPMG Consulting found that the BellSouth proposed prioritization process, along with the draft End-To-End Process Flow, Version 2.1, if implemented as described, would provide ALECs with a process to conduct mutual impact assessment and resource planning. Further, the process would allow ALECs a framework to evaluate, categorize, and prioritize Change Request that effect them. As this proposal has not yet been implemented and KPMG Consulting has therefore not had an opportunity to review it in operation, Exception 88 remains open.</p>
PPR1-4	The change management process includes procedures for allowing input from all interested parties.	Not Satisfied	<p>The change management process does not have a procedure to allow input from all interested parties. KPMG Consulting interviewed the Change Control and Release Management teams.</p> <p>During an interview with the Change Control Team on June 12, 2000, KPMG Consulting found that the change management process allowed ALECs to provide input on Change Requests via the Change Control Process, version 1.5.</p> <p>KPMG Consulting conducted an interview with the Release Management Team on April 26, 2001 and found that portions of the release management process did not allow ALECs to provide input into all Change Requests. Specifically, the process did not provide ALECs with the ability to prioritize, assess the impact of, and plan resources for all Change Requests affecting the ALEC community. KPMG Consulting issued Exception 88.</p> <p>KPMG Consulting conducted a refresh interview</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>with the Change Control Team on October 8, 2001 and was able to verify that the Change Control Process, version 3.1, was implemented and provided ALECs the opportunity to provide input on Change Requests.</p> <p>KPMG Consulting conducted a refresh interview with the Release Management Team on October 9, 2001 and confirmed that the Release Management Team continued to follow the previously reviewed processes and verified that a framework for ALECs to provide input to the internal change management process did not exist.</p> <p>On May 1, 2002, BellSouth provided a response to Second Amended Exception 88. The response proposed that BellSouth would implement a new Change Control Prioritization Process. The proposal stated that BellSouth would implement all Type 2 and Type 6 Change Requests as the highest priority in all future releases. The proposal further stated that BellSouth would use the remaining release capacity, after Type 2 and 6 Change Requests had been scheduled, to schedule Type 3, 4 and 5 Change Requests. The proposal stated that this remaining capacity would be split equally between BellSouth and CLECs with CLECs receiving half of the remaining releases in which to prioritize and implement Change Requests. BellSouth would repeat this process with the other half of the remaining releases.</p> <p>On June 10, 2002, BellSouth provided a draft of the End-To-End Process Flow, version 2.1. KPMG Consulting reviewed the documentation and conducted an interview regarding this process with BellSouth on June 11, 2002. KPMG Consulting found that the BellSouth proposed prioritization process along with the draft End-To-End Process Flow, Version 2.1, if implemented as described, would provide ALECs with a process to prioritize, assess the impact of, and plan resources for all Change Requests affecting the ALEC community. As this proposal has not yet been implemented and KPMG Consulting has therefore not had an opportunity to review it in operation, Exception 88 remains open.</p>
PPR1-5	The change management process has defined	Satisfied	The change management process has defined intervals for considering and notifying customers

Test Reference	Evaluation Criteria	Result	Comments
	intervals for considering and notifying customers about proposed changes.		<p>about proposed changes as defined in the Change Control Process, version 3.1.</p> <p>During an interview conducted with the Change Control Team on June 12, 2000, KPMG Consulting found that the change management process had defined intervals for most steps in the Change Control Process, version 1.5.</p> <p>KPMG Consulting conducted a refresh interview with the Change Control Team on October 8, 2001. KPMG Consulting was able to verify that the Change Control Process, version 3.1, was implemented and included defined intervals for considering and notifying ALECs of Change Requests.</p>
PPR1-6	Documentation regarding proposed changes is distributed on a timely basis.	Not Satisfied	<p>The change management process does not provide documentation of proposed changes on a timely basis.</p> <p>KPMG Consulting conducted a review of the BellSouth Carrier Notification Website beginning in May 2000. KPMG Consulting found that documentation of proposed changes was not provided on a timely basis as defined by the Change Control Process, version 1.5. KPMG Consulting issued Exception 5.</p> <p>BellSouth responded that KPMG Consulting had misclassified the types of notification provided and, therefore, applied the incorrect interval standard. KPMG Consulting agreed that an inappropriate standard was applied, but noted deficiencies in the Carrier Notification and Documentation defect processes. As a result, KPMG Consulting closed Exception 5 and issued Exception 23 and Exception 26.</p> <p>BellSouth updated the Change Control Process and published version 2.3 on May 18, 2001. The updated version defined and documented the procedures for correcting and providing notification of documentation defects. As a result, KPMG Consulting closed Exception 26.</p> <p>BellSouth updated the Change Control Process and published version 2.5 on June 18, 2001. The updated version defined and documented the Carrier Notification procedures. As a result, KPMG Consulting closed Exception 23.</p> <p>During further analysis of the BellSouth procedures for notifying ALECs of proposed</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>changes, KPMG Consulting found that BellSouth did not provide notification of System Outages (Type 1 Changes) in accordance with the Change Control Process, version 2.0. As a result, KPMG Consulting issued Exception 12.</p> <p>KPMG Consulting conducted a retest from March 12 through April 27, 2001 of Exception 12 on and found that BellSouth failed to provide notification in accordance with the Change Control Process, version 2.2. KPMG Consulting issued Amended Exception 12.</p> <p>KPMG Consulting conducted a second retest on October 22 through December 10, 2001 of Exception 12 and confirmed that BellSouth provides notification in accordance with the Change Control Process, version 3.1. As a result, KPMG Consulting closed Exception 12.</p> <p>KPMG Consulting's analysis of BellSouth Change Request website found that BellSouth was not classifying Change Requests as defects (Type 6) in accordance with the BellSouth definition of a defect. KPMG Consulting identified issues that were either incorrectly classified as features (Types 2, 4 or 5) or were not initiated in any change request. Therefore BellSouth was not providing documentation of system defects. As a result, KPMG Consulting issued Exception 123.</p> <p>BellSouth responded that the defects had been identified, but BellSouth had failed to initiate Change Requests in the CCP for each issue. BellSouth provided documentation entitled Type 6 Defect Notification Process as well as a job aid that describes the internal processes for identifying, managing, and resolving Type 6 defects in accordance with the Change Control Process. BellSouth has trained internal personnel on this process and provided them with both the Type 6 Defect Notification Process documentation and the relevant job aide, End-To-End Process and Type 6 Job Aid.</p> <p>KPMG Consulting is conducting a retest to ensure Type 6 defects are now initiated in accordance with the Change Control Process and internal procedures. Exception 123 remains open pending conclusion of the retest.</p> <p>KPMG Consulting continues to review the</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>BellSouth website to ensure that notification and documentation of System Impacting Changes is provided in a timely manner. KPMG Consulting identified additional instances of BellSouth's failure to provide timely notification and documentation of system impacting changes. As a result, KPMG Consulting issued Exception 155.</p> <p>BellSouth stated in their response to Exception 155 that some documentation referenced in Exception 155 had not been provided in accordance with the intervals defined by the Change Control Process. KPMG Consulting conducted a retest by reviewing the documentation associated with release 10.5, 10.6, and 11.0. KPMG Consulting found that the documentation associated with these releases had been provided in accordance with the Change Control Process and in a timely manner. As a result, KPMG Consulting closed Exception 155.</p>
PPR1-7	Procedures and systems are in place to track information such as descriptions of proposed changes, key notification dates, and change status.	Satisfied	<p>The Change Control Process, version 1.5, includes procedures to track Change Requests from initiation to implementation. Tracking information is available on the Change Control Process website.</p> <p>During an interview with the Change Control Team conducted on June 12, 2000, KPMG Consulting found that the change management process has procedures to track and provide status of Change Requests to all interested parties.</p> <p>The procedures for tracking Change Requests are located in the Change Control Process, version 1.5, as well as on the change management website. KPMG Consulting reviewed the tracking mechanisms available on the Change Control Process website.</p> <p>KPMG Consulting conducted a refresh interview with the Change Control Team on October 8, 2001. KPMG Consulting was able to verify that the Change Control Process, version 3.1, was implemented with procedures to track Change Requests. KPMG Consulting verified that the tracking information is available and accurate on the Change Control Process website.</p>
PPR1-8	Criteria are defined for prioritizing and assigning severity codes to Change	Not Satisfied	While the change management process does have criteria for prioritization and assigning severity codes to Change Requests, the criteria does not

Test Reference	Evaluation Criteria	Result	Comments
	severity codes to Change Requests ¹⁰ .		<p>codes to Change Requests, the criteria does not allow ALECs to prioritize, assess the impact of, and plan resources for all Change Requests affecting the ALEC community.</p> <p>During an interview conducted with the Change Control Team on June 12, 2000, KPMG Consulting found that the change management process had criteria for prioritization and severity coding in the Change Control Process, version 1.5.</p> <p>During an interview with the Release Management Team on April 26, 2001, KPMG Consulting found that the existing criteria for portions of the release management process did not allow ALECs to assess the impact of, and plan resources for all Change Requests affecting the ALEC community. As a result, KPMG Consulting issued Exception 88.</p> <p>KPMG Consulting conducted a refresh interview with the Change Control Team on October 8, 2001. KPMG Consulting verified that the Change Control Process, version 3.1, was implemented and had criteria for prioritization and severity coding on Change Requests.</p> <p>KPMG Consulting conducted a refresh interview with the Release Management Team on October 9, 2001. KPMG Consulting found that the Release Management Team had undergone no changes and still operated using the existing criteria for prioritization and severity coding.</p> <p>On May 1, 2002, BellSouth provided a response to Second Amended Exception 88. The response proposed that BellSouth would implement a new Change Control Prioritization Process. The proposal stated that BellSouth would implement all Type 2 and Type 6 Change Requests as the highest priority in all future releases. The proposal further stated that BellSouth would use the remaining release capacity, after Type 2 and 6 Change Requests had been scheduled, to schedule Type 3, 4 and 5 Change Requests. The proposal stated that this remaining capacity would be split equally between BellSouth and CLECs with CLECs receiving half of the remaining releases in</p>

¹⁰Defined as a process or set of processes for determining the order in which Change Requests will be implemented based on each Change Requests relative importance.

Test Reference	Evaluation Criteria	Result	Comments
			<p>which to prioritize and implement Change Requests. BellSouth would repeat this process with the other half of the remaining releases.</p> <p>On June 10, 2002, BellSouth provided a draft of the End-To-End Process Flow, version 2.1. KPMG Consulting reviewed the documentation and conducted an interview regarding this process with BellSouth on June 11, 2002. KPMG Consulting found that the BellSouth proposed prioritization process along with the draft End-To-End Process Flow, Version 2.1, if implemented as described, would provide ALECs with criteria to prioritize, assess the impact of, and plan resources for all Change Requests affecting the ALEC community. As this proposal has not yet been implemented and KPMG Consulting has therefore not had an opportunity to review it in operation, Exception 88 remains open.</p>

5.0 Parity Evaluation

A parity evaluation was not required for this test.

6.0 Final Summary

This section summarizes the number of test evaluation criteria discussed above and the number that was satisfied or not satisfied at the conclusion of this test.

6.1 Summary of Findings

There were eight evaluation criteria considered for the Change Management Practices Verification and Validation (PPR1) test. Four evaluation criteria received a satisfied result. Four evaluation criteria received a not satisfied result. Due to the not satisfied evaluation criteria (PPR1-3, PPR1-4, PPR1-6, and PPR1-8), it is KPMG Consulting's opinion that significant issues remain unresolved in the PPR1 testing area.

Test Reference	Evaluation Criteria	Result	Comments
			<p>KPMG Consulting conducted an interview on November 6, 2001 with the BellSouth TAFI Project Manager. Information gathered from this interview indicated that software development modifications, updates, and testing are performed by different parties, such as BellSouth, Andersen Consulting (now Accenture), and EDS. Interface development methodology responsibilities and activities are delineated in BellSouth's CLEC TAFI User Guide⁴². KPMG Consulting monitored CKS in order to verify BellSouth's adherence to the defined methodology.</p> <p><u>ALL INTERFACES</u></p> <p>In addition to maintaining interface development documentation, BellSouth Account Teams also provide assistance to ALECs for documentation completion and issue resolution for all interfaces. These procedures were updated to reflect BellSouth's restructuring of the Account Team organization in January 2002. They are defined in the Account Team/CLEC Care Team Methods Procedures, Account Team/CLEC Care Team Information Package, and in the EC/OSS Procedures document.</p>
PPR5-2	BellSouth has a software/interface development methodology that addresses requirements and specification definition, design, development, testing, and implementation.	Not Satisfied	<p>KPMG Consulting determined that BellSouth has a software/interface development methodology that addresses requirements and specification definition, design, development, testing, and implementation for all interfaces.</p> <p>Based on the number of defects encountered in BellSouth releases 10.2 and 10.3, however, it appears that the BellSouth software/interface development methodology is not consistently followed. Exception 157 was issued. As of June 10, 2002 there have been eighteen (18) software and six (6) documentation defects identified in Release 10.5. KPMG Consulting amended Exception 157 to reflect these additional issues. Exception 157 remains open.</p> <p><u>TAG</u></p> <p>KPMG Consulting determined that BellSouth employed a complete software/interface development methodology for TAG. This information was obtained in an interview conducted by KPMG Consulting with the BellSouth TAG development team on September 27, 2000. KPMG Consulting also reviewed BellSouth documentation and monitored CKS interface implementation</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>activities and determined that BellSouth was adhering to the process.</p> <p><u>EDI</u></p> <p>Refresh interviews conducted with the EDI Project Manager on November 7, 2001 and with the BellSouth Carrier-to-Carrier Testing Managers for EDI on November 15, 2001 confirmed that a methodology was in place and was being followed. KPMG Consulting reviewed BellSouth documentation and monitored CKS interface implementation activities and confirmed adherence to the interface development methodology.</p> <p>BellSouth's overall development lifecycle processes are defined in BellSouth's Change Control Process⁴³ (CCP) documentation. Methodologies that address requirements and specifications design and development are defined in the Requirements Development Process⁴⁴ and Requirements Process Flow⁴⁵ documents. The methodology that addresses testing is defined in the Encore Electronic Interface Ordering (EIO) Overall Test Strategy⁴⁶ document. The methodology that addresses development and testing are defined in the EIO Test Approach for EDI⁴⁷ and EDI Test Plan documents. Overall testing methodology for all interfaces is contained in the EIO Release Test Strategy and EIO Product Test Approach documents.</p> <p>During an interview with the BellSouth ALEC testing team on December 5, 2001, KPMG Consulting determined that BellSouth does not support Pre-Order testing in the CLEC Application Verification Environment (CAVE). In a follow-up interview held on December 10, 2001, KPMG Consulting determined that BellSouth did not have processes in place to support an ALEC request for a new pre-order test scenario. As a result, Exception 128 was issued. KPMG Consulting's retesting activities consisted of interviews with ALECs and Vendors who had conducted testing in the CAVE. From these discussions it was determined that an ALEC or Vendor could issue a pre-order transaction in CAVE. Exception 128 was subsequently closed.</p>

⁴³ Change Control Process Version 3.1, 05/29/2002.

⁴⁴ Requirement Development Process Version 2a, 05/19/1999

⁴⁵ BellSouth Requirement Process Flow

⁴⁶ ENCORE EIO Overall Test Strategy (T911) Version 2.0, 11/30/2001

⁴⁷ Encore EIO Test Approach Document (T910) for EDI Version 1.0, 9/21/2000

Test Reference	Evaluation Criteria	Result	Comments
			<p>KPMG Consulting found that BellSouth's EDI test environment is inadequate for testing an ALEC's EDI interface. The EDI test environment did not allow ALECs to fully test Local Number Portability (LNP) without the use of live customers. Exception 1 was issued. BellSouth developed a complete EDI test environment. KPMG Consulting was satisfied that this addressed the issues in Exception 1 and closed the exception.</p> <p>KPMG Consulting found, through testing of BellSouth's test cases provided to ALECs for EDI end-to-end testing, that the test cases were either incomplete or incorrect. KPMG Consulting issued Exception 3. BellSouth updated and completed the EDI test cases. KPMG Consulting was satisfied that this issue was resolved and closed Exception 3.</p> <p>Based on KPMG Consulting's experiences with EDI development and testing coupled with review of BellSouth documentation, KPMG Consulting determined that BellSouth lacked an appropriate process, methodology, and robust test environment for testing an ALEC-developed EDI interface. As a result, KPMG Consulting issued Exception 6.</p> <p>BellSouth developed the EDI test environment to address this issue. Based on a review of the testing process developed by BellSouth and observations of the CKS test transactions, KPMG Consulting was satisfied that this addressed the issues raised in Exception 6 and closed the exception.</p> <p><u>TAFI</u></p> <p>In the CLEC TAFI Specifications document, BellSouth defines system and functional requirements as well as design specifications, system components, testing, and implementation processes for ALECs. The above document is posted on the ALEC homepage of the BellSouth website. This information was confirmed in an interview with the BellSouth TAFI Project Manager on September 28, 2000. KPMG Consulting reviewed the BellSouth website and monitored CKS interface development activities. This allowed KPMG Consulting to determine that the information was correct and available to ALECs.</p> <p><u>ECTA</u></p> <p>KPMG Consulting reviewed BellSouth documentation and found that BellSouth did not have sufficient, publicly available, documentation</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>that provided information to ALECs about how to establish physical connectivity with the ECTA interface. Exception 7 was issued as a result. Exception 7 was closed following the issuance of the ECTA Start-up Guide and modified JIA.</p> <p>KPMG Consulting also monitored interface development efforts by CKS to confirm BellSouth's adherence to the process for ECTA requirements, specification definition, design, development, testing, and implementation. The monitoring of the CKS development of an ECTA interface allowed KPMG Consulting to determine that the required development information was available to ALECs and also correct.</p>
PPR5-3	Interface development methodology has a defined quality assurance process.	Not Satisfied	<p>KPMG Consulting determined that the BellSouth interface development methodology documentation includes a quality assurance process. However, as evidenced by the number of defects encountered in BellSouth Releases 10.2 and 10.3, it appears that the BellSouth Quality Assurance process is not consistently followed. Based on this finding, KPMG Consulting issued Exception 157.</p> <p>KPMG Consulting reviewed the results of Release 10.5 to ensure adherence to the BellSouth quality assurance process. As of June 10, 2002 there have been eighteen (18) software and six (6) documentation defects identified in Release 10.5. KPMG Consulting amended Exception 157 to reflect these additional issues, and the exception remains open.</p> <p><u>TAG</u></p> <p>As a result of interviews with the BellSouth TAG Project Manager on September 27, 2000 and on November 14, 2001, KPMG Consulting determined that BellSouth has a defined and documented quality assurance process for interface development. The overall quality assurance strategy is defined in the TAG Quality Assurance Plan⁴⁸; the processes for verifying defects and managing defect resolution are defined in the document entitled Electronic Interface Testing Guidelines⁴⁹; and a release management strategy is</p>

⁴⁸ TAG & RoboTAG Quality Assurance Plan, version 3, 04/17/2001

⁴⁹ Electronic Interface Testing Guidelines, version 4.0, dated April 2002

Test Reference	Evaluation Criteria	Result	Comments
			<p>set forth in the Release Management End-to-End Process Flow⁵⁰ document.</p> <p>KPMG Consulting identified that BellSouth does not apply system fixes to defects for all production versions of the OSS interfaces.</p> <p>EDI</p> <p>Based on interviews held with the EDI Project Manager on September 13, 2000 and November 11, 2001, KPMG Consulting determined that BellSouth has a defined and documented quality assurance process for EDI interface development. These quality control processes are defined in the EIO Product Test Approach and Electronic Interface Testing Guidelines and the EDI Testing Guidelines for CLECs⁵¹ documents.</p> <p>The problem resolution process for tracking defects was discussed in an interview with the EDI project team members of BellSouth on November 7, 2001 and with the LENS project team on September 11, 2000 and November 12, 2001. KPMG Consulting discovered that there was a standard procedure that assures that defects are properly verified, and that the management of the defect resolution processes is defined (as per the Release Management End-to-End Process Flow document).</p>
PPR5-4	Responsibilities and procedures for developing and updating interface specification documents are defined.	Satisfied	<p>KPMG Consulting has determined that BellSouth has defined responsibilities and documents for developing and updating interface specification documents for all interfaces.</p> <p>KPMG Consulting issued Exception 168, which noted that BellSouth has not updated the BellSouth Pre-order business rules to correlate to the correct versions of TAG. This issue had previously been noted in Exception 25, which was closed when BellSouth updated the relevant documents. In BellSouth's response to Exception 168, it noted the problem and stated that it would correct the website. KPMG Consulting reviewed the BellSouth website, verified that the updates had been applied, and closed Exception 168.</p> <p>As a result of interviews conducted by KPMG Consulting with the BellSouth Interconnection Operations Group on September 12, 2000 and the Electronic Interface Support Group on September</p>

⁵⁰ Release Management End-to-End Process Flow, version 1.2, dated 01/15/2002

⁵¹ EDI Testing Guidelines for CLECs, version 4, dated June 20, 2001

Test Reference	Evaluation Criteria	Result	Comments
			<p>communities. KPMG Consulting attended and monitored the TAG user forum discussions to verify that this forum was made available as part of on-going customer interface development.</p> <p><u>EDI</u></p> <p>KPMG Consulting conducted an interview with the BellSouth Interconnection Operations Group on September 12, 2000 and was informed that there was regular communication forums held for customer interface development. An EDI user forum was established to improve communication between BellSouth and the EDI user community.</p> <p><u>ECTA</u></p> <p>BellSouth ECTA is an ANSI standard interface and thus follows ANSI forums/meetings and newsletters. For ECTA, each client has a unique software module. New functionality is introduced to a client's module only after that client indicates a desire to use it thereby allowing the ALEC to decide whether to adopt the new national standard.</p> <p>Through interviews conducted with the BellSouth Project Manager for ECTA on September 28, 2000 and November 6, 2001, KPMG Consulting confirmed that procedures for regular communications for customer interface development with BellSouth are documented.</p> <p><u>LENS and TAFI</u></p> <p>This criterion was not applicable to the LENS or TAFI interfaces because there is no ALEC development required for these GUI interfaces.</p>
PPR5-17	A software and interface development methodology exists that defines the process for release management and control.	Not Satisfied	<p>KPMG Consulting determined that the BellSouth software and interface development methodology includes the process for release management and control; however, it is not consistently followed. KPMG Consulting reviewed these procedures as related to release 10.5 scheduled for production on May 31, 2002.</p> <p>Based on the number of defects encountered in BellSouth releases 10.2 and 10.3, it appears that the BellSouth Quality Assurance process is not consistently followed for new software releases. Exception 157 was issued. KPMG Consulting reviewed the results of Release 10.5 to ensure adherence to the BellSouth quality assurance process. As of June 10, 2002 there have been eighteen (18) software and six (6) documentation</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>defects identified in Release 10.5. KPMG Consulting amended Exception 157 to reflect these additional issues, and this exception remains open.</p> <p>The overall release management process was discussed in interviews with the BellSouth Release Manager on September 26, 2001 and on November 11, 2001. This process is applicable to all BellSouth interfaces. Based on these interviews and review of formal documentation, BellSouth has a defined and documented release management process that is adhered to for all ENCORE releases.</p> <p>Release management and version control procedures are defined in the Release Management End-to-End Process Flow document and the Encore EIO Deliverable Application Rolling Release Plan documents.</p>
PPR5-18	Business rules and software change logs exist, are updated and shared with ALECs in a timely manner.	Satisfied	<p>KPMG Consulting has determined that BellSouth maintains and updates business and software change logs. These are shared with the ALECs in a timely manner.</p> <p>Through interviews with BellSouth documentation and Project Managers on September 12, 2000, and November 15, 2001, KPMG Consulting noted that business rules and software change logs existed and were updated by BellSouth for sharing with ALECs. Business rules and software changes are recorded and distributed via the Change Request Log, as documented in BellSouth's Change Control Process document. Changes are approved, prioritized, and managed according to the document entitled Release Management End-to-End Process Flow. This process is applicable to all BellSouth interfaces.</p>
PPR5-19	Technical and business processes (i.e., software testing, bug fixes, release notification, etc.) exist and are adhered to during customer development and pre-production testing.	Satisfied	<p>BellSouth adheres to technical and business processes during development and pre-production testing.</p> <p><u>TAG, EDI, and LENS</u></p> <p>New releases are developed, tested, and deployed on a scheduled basis, as defined in the Electronic Interface Implementation and Upgrade Communication Plan. Acceptance testing is completed prior to production release, as defined in CAVE User Acceptance Testing Plan⁷¹. Timing of new releases allows time for customers to develop changes and is controlled by the Release</p>

⁷¹ CAVE User Acceptance Testing Plan, version 4, dated 04/20/2001.

Test Reference	Evaluation Criteria	Result	Comments
			<p><u>ECTA</u></p> <p>For ECTA, procedures are defined in the JIA. Based on the currently low volumes, resources to support changes in service demand are not warranted at this time.</p>
PPR5-23	Contingency plans for production interfaces exist to mitigate the impact of unexpected changes in business and transaction volume.	Satisfied	<p>BellSouth has contingency plans in place to mitigate the impact of unexpected changes in business or transaction volumes.</p> <p><u>TAG, EDI, LENS, and TAFI</u></p> <p>Through an interview conducted with the BellSouth disaster recovery team on November 14, 2001, BellSouth identified that contingency plans for production interfaces exist for unexpected circumstances. Procedures used by BellSouth and EDS to mitigate the impact of unexpected changes are defined in the Capacity Planning Methodology, Practices, and Requirements document.</p> <p><u>ECTA</u></p> <p>For ECTA, procedures for component and fail-over recovery are defined in the JIA.</p>

5.0 Parity Evaluation

A parity evaluation was not required for this test.

6.0 Final Summary

This section summarizes the number of test evaluation criteria discussed above and the number that was satisfied or not satisfied at the conclusion of the test.

6.1 Summary of Findings

There were 23 evaluation criteria considered for the Interface Development Verification and Validation Review (PPR5) test. Twenty evaluation criteria received a satisfied result. Three evaluation criteria (PPR5-2, PPR5-3, PPR5-17) received a not satisfied result. It is KPMG Consulting's opinion that significant issues remain unresolved in the PPR5 testing area.

Test Reference	Evaluation Criteria	Result	Comments
	(FOCs).		<p>assigned a completed (CP) status in CSOTS. KPMG Consulting issued Exception 117. BellSouth agreed that KPMG Consulting did not receive the responses due to BellSouth employee errors. The LCSC and CRSG management trained employees on the need for accuracy and the consequences of making errors. KPMG Consulting submitted additional orders via FAX/Email and determined that BellSouth returned all expected FOCs. Exception 117 was closed.</p> <p>KPMG Consulting applied a benchmark for receipt of accurate FOCs of 95%.</p> <p>A sample of 540 FOCs received from February 28, 2002 through April 2, 2002 was examined for clarity, accuracy and completeness relative to the BBR-LO.</p> <p>♦ 96.85% (523 of 540) of FOCs received were accurate and complete⁶³.</p> <p>KPMG Consulting issued Exception 166 which states that BellSouth provided inconsistent information on FOC responses for Resale and UNE-P service requests submitted via TAG and EDI interfaces. BellSouth identified an issue in LESOG and implemented a system fix with release in 10.5 on June 1, 2002 to address the missing Billing Account Number (BAN) field on FOC responses. KPMG Consulting validated 19 FOC FOC responses after June 1, 2002 and confirmed that the BAN on the FOC was returned. Exception 166 is closed.</p>
TVV1-2-2	BellSouth system or representatives provide accurate and complete Error (ERR)/Clarification (CLR) messages.	Not Satisfied	<p>BellSouth system or representatives do not provide accurate and complete ERR CLR messages.</p> <p>KPMG Consulting applied a benchmark for receipt of accurate ERRs/CLRs of 95%.</p> <p>A sample of 751 clarification responses received from March 15, 2001 through November 7, 2001 was examined to determine compliance with BBR-LO.</p> <p>♦ 96.01% (721 of 751) of clarification responses were in compliance with the BBR-</p>

⁶³ KPMG Consulting excluded 141 FOC responses from the Accuracy and Completeness evaluation due to a BellSouth LESOG defect, which was fixed in release 10.5.

Test Reference	Evaluation Criteria	Result	Comments
			<p>LO.</p> <p>A sample of 713 clarification responses received from February 28, 2002 through April 2, 2002 was examined to determine compliance with BBR-LO.</p> <ul style="list-style-type: none"> ♦ 96.49% (688 of 713) of clarification responses were in compliance with the BBR-LO. <p>An additional sample of 308 clarification responses from April 3, 2002 through May 15, 2002 were also examined to determine compliance with the BBR-LO.</p> <ul style="list-style-type: none"> ♦ 89.29% (275 of 308) of clarification responses were in compliance with the BBR-LO. <p>KPMG Consulting issued Exception 165. BellSouth's response indicated that of the 54 inaccurate responses, they agreed with KPMG Consulting's assessment of 33 responses resulting an 89% accuracy rate. Exception 165 addressed issues including errors in the BBR-LO and BellSouth employee errors. Exception 165 remains open.</p> <p>The following BellSouth system and representative issues were observed:</p> <ul style="list-style-type: none"> ♦ KPMG Consulting observed that while issuing ISDN-BRI orders to BellSouth, error messages were generated contrary to BellSouth Business Rules. KPMG Consulting issued Exception 73. BellSouth responded by updating the Business Rules⁶⁴ for ISDN conversions. KPMG Consulting validated the new documentation and issued orders following the new requirements. No further error messages were received related to this issue. Exception 73 was closed. ♦ KPMG Consulting issued Line Sharing orders to BellSouth adhering to the BellSouth Business Rules and received error messages that were inconsistent with the expected response. KPMG Consulting issued Exception 75. BellSouth responded with its implementation on July 28, 2001 of ENCORE release 9.4, which included

⁶⁴ OSS '99 Issue 90 June 29, 2001.

Test Reference	Evaluation Criteria	Result	Comments
			Change Control process enhancements for Line Sharing. KPMG Consulting issued Line Sharing orders after the implementation date to validate the BellSouth response and no longer observed inappropriate error messages. Exception 75 was closed.
TVV1-2-3	BellSouth systems or representatives provide accurate and complete Completion Notices (CNs).	Satisfied	<p>BellSouth systems or representatives provide accurate and complete CNs.</p> <p>KPMG Consulting applied a benchmark for receipt of accurate CNs of 95%.</p> <p>A sample of 146 CN responses received from March 5, 2002 through May 10, 2002 were examined to determine compliance with the BBR-LO.</p> <ul style="list-style-type: none"> ♦ 97.26% (142 of 146) of CN responses received were found to be accurate and complete per the BellSouth Business Rules.
TVV1-2-4	BellSouth systems or representatives provide, accurate and complete Missed Appointment (MA) Notifications.	Satisfied	<p>BellSouth systems or representatives provide, accurate and complete MAs.</p> <p>KPMG Consulting applied a benchmark for receipt of accurate MAs of 95%.</p> <p>A sample of 28 MA responses received from March 13, 2001 through May 22, 2002 was examined to determine compliance with the BBR-LO.</p> <ul style="list-style-type: none"> ♦ 92.86%⁶⁵ (26 of 28) of MA responses received were found to be accurate and complete per the BellSouth Business Rules. <p>KPMG Consulting issued Exception 170 detailing the fields and values in the MA responses that did not comply with the BBR-LO. BellSouth's response disagreed with KPMG Consulting's analysis of the missing fields in the MA responses. Additional analysis of the CLEC FCIF files for these PONs show that KPMG Consulting received the appropriate fields and values for MA responses. Exception 170 was closed.</p>
TVV1-2-5	BellSouth Service Order Tracking System (CSOTS)	Satisfied	BellSouth CSOTS provides accurate LSR status.

⁶⁵ Although the test percentage is below the benchmark of 95%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. The inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.4117, above the 0.0500 cut-off for a statistical conclusion of failure.

Test Reference	Evaluation Criteria	Result	Comments
			<p>within eight hours.</p> <p>During subsequent testing conducted from February 28, 2002 through May 22, 2002, KPMG Consulting received ACKs within the following timeframes:</p> <ul style="list-style-type: none"> ♦ 99.41% (168 of 169) of ACKs were received within eight hours. <p>See Tables 1-56 through 1-57 for additional transaction details.</p>
TVV1-3-16	BellSouth's manual order process provides reject (REJ) responses within the agreed upon standard interval.	Not Satisfied	<p>BellSouth's manual order process does not provide REJ responses within the agreed upon standard interval.</p> <p>The O-8 SQM standard for Non-Mechanized REJs is 85% received within 24 hours¹⁴⁰.</p> <p>During initial testing conducted from March 13, 2001 through February 27, 2002, KPMG Consulting received REJs within the following timeframes:</p> <ul style="list-style-type: none"> ♦ 86.56% (876 of 1,012) of REJs were received within 24 hours.¹⁴¹ <p>KPMG Consulting issued Exception 97. BellSouth responded that KPMG Consulting did not consider applicable exclusions. KPMG Consulting agreed, and withdrew the exception.</p> <p>During subsequent testing conducted from February 28, 2002 through May 22, 2002, KPMG Consulting received REJs within the following timeframes:</p> <ul style="list-style-type: none"> ♦ 83.33% (155 of 186) of Rejects were received within 24 hours.¹⁴² <p>KPMG Consulting issued Exception 161 when it was determined that non-mechanized rejects were returned late. BellSouth responded that O-8 SQM Standard does not apply to orders sent directly to the CRSG. The CRSG Guidelines that provide the Rejection and Clarification Standards for complex products and services are located on the Interconnection Services website. Exception</p>

¹⁴⁰ SQM O-8 included orders sent to the LCSC that receive a REJ, KPMG Consulting applied O-8 to all REJs in lieu of an approved standard.

¹⁴¹ KPMG Consulting excluded 13 Non-Mechanized REJs due to initial FOC responses and 1 Non-Mechanized FOC due to an inaccurate timestamp.

¹⁴² KPMG Consulting excluded 5 Non-Mechanized REJs received after the initial FOC response.

Test Reference	Evaluation Criteria	Result	Comments
			161 remains open. See Tables 1-58 through 1-59 and Figure 1-4 for additional transaction details.
TVV1-3-17	BellSouth's manual order process provides Firm Order Confirmation (FOC) responses within the agreed upon standard interval.	Satisfied	<p>BellSouth's manual order process provides FOC responses within the agreed upon standard interval.</p> <p>The O-9 SQM standard for Non-Mechanized FOCs is 85% received within 36 hours.</p> <p>During initial testing conducted from March 13, 2001 through February 27, 2002, KPMG Consulting received FOCs within the following timeframes:</p> <ul style="list-style-type: none"> ♦ 82.75% (235 of 284) of FOCs were received within 36 hours.¹⁴³ <p>KPMG Consulting issued Exception 90¹⁴⁴. This exception states that KPMG Consulting did not receive timely non-mechanized FOCs from BellSouth via fax and electronic mail. BellSouth responded that O-9 SQM does not apply to LSRs submitted to the CRSG. This requires an internal service inquiry. KPMG Consulting should apply O-10 SQM. KPMG Consulting issued 2nd Amended Exception 90 and applied O-9 SQM to LSRs submitted to the CRSG that do not require an internal service inquiry. BellSouth responded that KPMG Consulting should apply the products and services interval guide to LSRs submitted to the CRSG that do not require an internal service inquiry. KPMG Consulting issued 3rd Amended Exception 90 and applied the products and services interval guide to LSRs submitted to the CRSG that do not require an internal service inquiry. BellSouth responded that they would address personnel issues regarding FOC timeliness to prevent future recurrence of the issues identified in the items referenced.</p> <p>During subsequent testing conducted from February 28, 2002 through May 22, 2002, KPMG Consulting received FOCs within the following timeframes¹⁴⁵:</p> <ul style="list-style-type: none"> ♦ 93.24% (69 of 74) of FOCs were received

¹⁴³ KPMG Consulting excluded 2 Non-Mechanized FOCs received after the initial REJ response.

¹⁴⁴ KPMG Consulting issued Exception 90 and amended the Exception prior to BellSouth's response.

¹⁴⁵ KPMG Consulting applied a standard of 85% of Non-Mechanized FOCs received within 24 hours due to an interval guide change.

Table 1-68: December 21, 2001 – February 12, 2002 Average Pre-Order Response Timeliness by Pre-Order Type

Pre-order Type	Total Transactions Sent	Average Response Time (seconds)	Parity with Retail/ Benchmark ¹⁵⁸
AVQ	257	4.38	3.25
TNCAN_TN	161	2.71	3.08

Table 1-69: April 5, 2002 – May 2, 2002 Average Pre-Order Response Timeliness by Pre-Order Type

Pre-order Type	Total Transactions Sent	Average Response Time (seconds)	Parity with Retail/ Benchmark ¹⁵⁹
AVQ	152	3.84	3.32

5.0 Parity Evaluation

A parity evaluation was not required for this test.

6.0 Final Summary

This section summarizes the number of test evaluation criteria discussed above and the number of evaluation criteria satisfied or not satisfied at the conclusion of this test.

6.1 Summary of Findings

There were 40 evaluation criteria considered for the POP Functional Evaluation (TVV1). Thirty-eight evaluation criteria received a satisfied result. Two evaluation criteria received a not satisfied result. It is KPMG Consulting's opinion that significant issues remain unresolved in the TVV1 testing area.

¹⁵⁸ BellSouth retail pre-order response times were obtained from the December 2001 through January 2002 Pre-Ordering and Ordering OSS Report performance measurement reports. KPMG Consulting did not use the February 2002 report for calculating AVQ response time due to abnormal parity data.

¹⁵⁹ BellSouth retail pre-order response times were obtained from the January 2002 Pre-Ordering and Ordering OSS Report performance measurement reports. KPMG Consulting used the January 2002 report due to abnormal parity data for the month of April 2002 and May 2002.

Test Reference	Evaluation Criteria	Result	Comments
			Products for additional details.
TVV3-2	BellSouth systems process UNE ²⁹⁴ order transactions in accordance with published flow-through rules.	Not Satisfied	<p>BellSouth systems do not process UNE order transactions in accordance with published flow-through rules.</p> <p>KPMG Consulting used the O-3: Percent Flow-Through Service Requests (Summary) SQM standard²⁹⁵ for UNE order transactions. The standard is 85% flow-through.</p> <p>During the initial production testing from March 13, 2001 through November 25, 2001, KPMG Consulting issued 566 UNE orders that were expected to flow-through BellSouth systems. Of the 566 orders, 416 (73.50%) flowed through. The initial flow-through test did not include Digital Subscriber Line (DSL) orders.</p> <p>Exception 122 was issued detailing that BellSouth did not provide flow-through classification information on the LSR Detail Report²⁹⁶ for DSL orders. Exception 122 remains open pending corrective action taken by BellSouth.</p> <p>During production retesting from November 26, 2001 through February 17, 2002, KPMG Consulting issued 196 UNE orders that were expected to flow-through BellSouth systems. Of the 196 orders, 161 (82.14%) flowed through.</p> <p>Exception 136 was issued detailing that BellSouth's performance on UNE flow-through during testing through January 4, 2002 was below the SQM standard. BellSouth's response to Exception 136 indicated that a defect modification was completed in a release in February 2002 to address orders that fell out for manual handling due to a calculate due date problem.</p> <p>KPMG Consulting began its second retest on February 28, 2002. During the production second retest from February 28, 2002 through May 15, 2002, KPMG Consulting issued 378 UNE orders that were expected to flow-through BellSouth systems. Of the 378 orders, 282</p>

²⁹⁴ UNE transactions include analog and digital loops.

²⁹⁵ Ordering Measure O-3 of the SQM Plan.

²⁹⁶ Ordering Measure O-6 of the SQM Plan.

Test Reference	Evaluation Criteria	Result	Comments
			<p>(74.60%) flowed through.</p> <p>Based on retesting results through March 24, 2002, KPMG Consulting issued Second Amended Exception 136. The amendment noted that BellSouth's performance on UNE flow-through was below the SQM standard. BellSouth's response indicated that a system enhancement was opened and implemented on June 1, 2002, to increase the opportunity for flow through of xDSL migration orders.</p> <p>Exception 136 remains open.</p> <p>See Table 3-7: Detailed Results for UNE products for additional details.</p>
TVV3-3	BellSouth systems process business resale and UNE-P order transactions in accordance with published flow-through rules.	Satisfied	<p>BellSouth systems process business resale and UNE-P order transactions in accordance with published flow-through rules.</p> <p>KPMG Consulting used the O-3: Percent Flow-Through Service Requests (Summary) SQM standard²⁹⁷ for business, residential and UNE-P order transactions. The standard is 90% flow-through.</p> <p>During the initial production testing from March 13, 2001 through November 25, 2001, KPMG Consulting issued 691 business resale and UNE-P orders that were expected to flow-through BellSouth systems. Of the 691 orders, 621 (89.87%) flowed through.</p> <p>Exception 86 was issued to note that BellSouth's performance on business flow-through through June 29, 2001 was below the SQM standard. BellSouth's response to Exception 86 indicated that defects and features were implemented in releases in September 2001 and November 2001 to address flow-through problems.</p> <p>KPMG Consulting began retesting on November 26, 2001. Based on retesting results through January 4, 2002, KPMG Consulting amended Exception 86. The amendment noted that BellSouth's performance on business flow-through was below the SQM standard of 90%. BellSouth's response to Amended Exception 86 indicated that a defect modification was completed in a release in February 2002 to</p>

²⁹⁷ Ordering Measure O-3 of the SQM Plan.

Test Reference	Evaluation Criteria	Result	Comments
TVV3-4	BellSouth systems process LNP order transactions in accordance with published flow-through rules.	Not Satisfied	<p>BellSouth systems do not process LNP order transactions in accordance with published flow-through rules.</p> <p>KPMG Consulting used the SQM standard²⁹⁹ O-3 for LNP order transactions. The standard is 85% flow-through.</p> <p>During production testing from March 13, 2001 through November 25, 2001, KPMG Consulting issued 110 LNP orders that were expected to flow-through BellSouth systems. Of the 110 orders, 79 (71.82%) flowed through.</p> <p>Exception 121 was issued detailing that BellSouth's performance on LNP flow-through was below the SQM standard of 85%. BellSouth's response to Exception 121 indicated that KPMG Consulting should exclude several items because the orders were planned fallout. BellSouth also posted a red-line SQM to clarify LNP planned manual fallout on supplemental (SUP) orders.</p> <p>Based on BellSouth's response, KPMG Consulting conducted an LNP flow-through retest. During the LNP flow-through retest from November 30, 2001 through April 30, 2002, KPMG Consulting issued 34 LNP orders that were expected to flow-through BellSouth systems. Of the 34 orders, 28 (82.35%) flowed through.</p> <p>KPMG Consulting issued Amended Exception 121 to note that BellSouth's LNP flow-through retest performance was below the SQM standard of 85%. Exception 121 remains open.</p> <p>See Table 3-9: Detailed Results for LNP Products for additional details.</p>
TVV3-5	BellSouth flow-through documentation is complete, accurate, and clear.	Satisfied	<p>BellSouth flow-through documentation is complete, accurate, and clear.</p> <p>KPMG Consulting evaluated order flow-through documentation available on the BellSouth website. During KPMG Consulting's initial review of BellSouth's flow-through documentation, the documentation was found to be incomplete and inconsistent, and Exception 33 was issued.</p> <p>BellSouth updated the LSR Flow-Through</p>

²⁹⁹ Ordering Measure O-3 of the SQM Plan.

Table 3-9: Detailed Results for LNP Products

Initial Test: March 13, 2001 – November 25, 2001	
Number of Expected Flow-Through FOCs	110
Number of Flow-Through FOCs	79
Percent Flow-Through	71.82%
SQM Benchmark	85%
Retest: November 26, 2001 – April 30, 2002	
Number of Expected Flow-Through FOCs	34
Number of Flow-Through FOCs	28
Percent Flow-Through	82.35%
SQM Benchmark	85%

5.0 Parity Evaluation

KPMG Consulting conducted a retail-wholesale functionality comparison as included in the Master Test Plan. This comparison found that retail order requests entered into the BellSouth systems by retail customer contact representative result in a service order format that can be transmitted directly to SOCS.

ALECs use the industry-standard LSR format to submit wholesale orders via electronic interfaces. The LSR goes through an edit and service order generation process to translate the LSR into a service order format that is then transmitted directly to SOCS.

Since retail orders do not require a translation process, retail orders do not experience fallout that can be compared to the fallout experienced by wholesale orders.

The wholesale equivalents of the BellSouth retail representatives are the representatives in the LCSC. The LCSC representatives process the LSRs that have fallen out of the wholesale ordering systems and input these requests, using a BellSouth service order negotiation system, into a SOCS compatible service order format that is directly transmitted to SOCS.

6.0 Final Summary

This section summarizes the number of test evaluation criteria discussed above and the number that was satisfied or not satisfied at the conclusion of this test.

6.1 Summary of Findings

There were five evaluation criteria considered for the Order Flow-Through Evaluation (TVV3). Three evaluation criteria received a satisfied result. Two evaluation criteria received a not satisfied result. Due to the not satisfied evaluation criteria (TVV3-2 and TVV3-4), it is KPMG Consulting's opinion that significant issues remain unresolved in the TVV3 testing area.

The Provisioning Verification and Validation (TVV4) test included a checklist of evaluation criteria developed by the KPMG Consulting during the initial phase of the BellSouth OSS Evaluation. These evaluation criteria provided the framework of norms, standards, and guidelines for the Provisioning Verification and Validation (TVV4) test. The data collected were analyzed employing the evaluation criteria identified in Section 4.1 below.

4.0 Results

This section contains the overall test results.

4.1 Results Summary

The number of exceptions and observations issued during the life of the test is depicted in Table 4-1. For additional exception and observation information, refer to Appendix D and E, respectively. The test criteria and results are presented in Table 4-2 below.

Table 4-1: TVV4 Exception and Observation Activity

Activity	Exceptions	Observations
Total Issued	10	18
Total Disposed as of Final Report Date	7	18
Total Remaining Open as of Final Report Date	3	0

Table 4-2: TVV4 Evaluation Criteria and Results

Test R	Evaluation Criteria	Result	Comments
Directory Listing			
TVV4-1	BellSouth's directory assistance database contains required field inputs.	Not Satisfied	<p>BellSouth's directory assistance database does not contain required field inputs.</p> <p>In the absence of a documented BellSouth standard for accuracy of provisioning, KPMG Consulting applied a benchmark of 95%.</p> <p>KPMG Consulting reviewed 217 directory listing orders from April 2001 – August 2001 to determine if BellSouth provisioned the directory listings accurately. BellSouth provisioned 197 directory listings (91%) accurately. Examples of discrepancies included: listings not appearing in the database as well as listings containing incorrect information.</p> <p>KPMG Consulting continued to validate the available directory listing data. The continued analysis resulted in a total of 430 directory listings reviewed with 409</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>(95.1%) provisioned correctly.</p> <p>Based on BellSouth provided information, which indicated that service representatives received supplemental training, business rules were updated to reflect the most current procedures and a system fix was scheduled to correct orders that contained a hunting feature, KPMG Consulting conducted a retest although the hunting feature correction was not implemented.</p> <p>During retesting, KPMG Consulting reviewed 141 directory listings from December 2001– February 2002. BellSouth provisioned 135 (95.7%) directory listings accurately. The hunting feature was not tested.</p> <p>KPMG Consulting found additional discrepancies identified during the retest.</p> <p>During the second retest, KPMG Consulting reviewed 152 directory listings from April 2002 and May 2002. BellSouth provisioned 130 (85.5%) directory listings accurately.</p> <p>KPMG Consulting identified additional discrepancies during the second retest. KPMG Consulting issued Exception 171. Exception 171 remains open.</p>
TVV4-2	BellSouth provisions directory listings on the due date.	Satisfied	<p>BellSouth provisions directory listings on the due date.</p> <p>In the absence of a documented BellSouth standard for provisioning timeliness, KPMG Consulting applied a benchmark of 95%.</p> <p>During initial testing, KPMG Consulting reviewed 74 directory listings from April 2001– June 2001 to determine if BellSouth provisioned the listings on the due date. BellSouth provisioned 49 (66.2%) directory listings on the due date. As a result, KPMG Consulting issued Exception 82.</p> <p>Based on BellSouth's response, KPMG Consulting continued testing. KPMG Consulting reviewed a total of 276 directory listings from April 2001 –</p>

Test Reference	Evaluation Criteria	Result	Comments
			October 2001 to determine if BellSouth provisioned the listings on the due date. BellSouth provisioned 263 (95.2%) directory listings on the due date. Based on these results, Exception 82 was closed.
Switch Translation			
TVV4-3	BellSouth's switch translations contain required field inputs.	Not Satisfied	<p>BellSouth's switch translations do not contain accurate field inputs.</p> <p>In the absence of a documented BellSouth standard for accuracy of provisioning, KPMG Consulting applied a benchmark of 95%.</p> <p>During initial testing, KPMG Consulting reviewed 435 switch translations from April – October 2001 to determine if BellSouth provisioned features and services accurately. BellSouth provisioned 409 (94%) switch translations accurately. As a result, KPMG Consulting issued Exception 84.</p> <p>Based on BellSouth's response, KPMG Consulting conducted a retest. BellSouth trained their service reps, updated their internal M&Ps to correctly identify features codes when provisioning services, and a system fix was scheduled to correct orders that contained a hunting feature. KPMG Consulting conducted the retest even though the hunting feature correction was not implemented.</p> <p>During retesting, KPMG Consulting reviewed 162 switch translations from December 2001 – February 2002 to determine if BellSouth provisioned features and services accurately. BellSouth provisioned 161 (99.4%) switch translations accurately. KPMG Consulting updated Exception 84 to detail the discrepancy. This discrepancy involved restoring the service of a suspended customer. The hunting feature was not tested.</p> <p>During the second retest, KPMG Consulting reviewed 134 switch translations from April – May 2002. BellSouth provisioned 120 (90%) switch translations accurately.</p>

Test Reference	Evaluation Criteria	Result	Comments
			KPMG Consulting updated Exception 84 to detail the discrepancies. The discrepancies involved the provisioning of hunting services and LPICs. Exception 84 remains open.
High Capacity Circuit Provisioning			
TVV4-4	BellSouth provisions DS1/DS3 circuits according to documented M&P tasks.	Satisfied	<p>BellSouth provisions DS1/DS3 circuits according to documented M&P tasks.</p> <p>In the absence of a documented BellSouth standard for accuracy of provisioning, KPMG Consulting applied a benchmark of 95%.</p> <p>During testing, KPMG Consulting observed BellSouth technicians install 135 (14 Test Bed, 121 commercial) DS1/DS3 circuits (619 M&P tasks) from July 9, 2001 to April 19, 2002. BellSouth provisioned 595 tasks (96.1%) in accordance with documented methods and procedures.</p>
TVV4-5	BellSouth meets the DS1 circuit percent missed installation appointment parity performance requirement.	Testing in Progress	<p>KPMG Consulting is not yet able to determine whether BellSouth meets the parity performance requirements for SQM metric P-3: Percent Missed Installation Appointments measures for DS1 circuits, for wholesale.</p> <p>Metric P-3 measures the extent to which BellSouth provisions DS1 circuits for customers by the scheduled due date. The defined standard is parity against retail average.</p> <p>KPMG Consulting reviewed 105 commercial DS1 service orders in July 2001, March - April 2002. BellSouth provisioned 103 (98.1%) commercial DS1 service orders on the confirmed due date.</p> <p>BellSouth provisioned 2601 (99.2%) of the 2622 retail DS1 service orders on the confirmed due date. The retail results cover the July 2001 and March 2002 periods only.</p> <p>BellSouth's retail results during the same time period were XX%. KPMG Consulting is waiting to receive the BellSouth retail results to complete the</p>

Test Reference	Evaluation Criteria	Result	Comments
			Unbranded OS/DA service orders accurately. Based on these results, Exception 167 was closed.
CN Data Integrity			
TVV4-27	The completion date on BellSouth's CN corresponds with the FOC due date and reflects the date when the actual work was finished.	Satisfied	<p>The completion date on BellSouth's CN correspond with the promised due date and reflects the date when the actual work was finished.</p> <p>In the absence of a documented BellSouth standard for accuracy of provisioning, KPMG Consulting applied a benchmark of 95%.</p> <p>During initial testing, KPMG Consulting reviewed 43 orders from September – October 2001 to determine if BellSouth completed all physical and systems work on the FOC due date. BellSouth completed 38 (88.3%) orders in a timely manner. As a result, KPMG Consulting issued Exception 130.</p> <p>Based on BellSouth's response, KPMG Consulting conducted a retest. BellSouth could not determine the causes of the discrepancies and recommended that KPMG Consulting conduct a retest.</p> <p>During retesting, KPMG Consulting reviewed 88 CNs from December 2001 – January 2002 to determine if BellSouth completed all physical and systems work on the promised due date. BellSouth completed 77 (88%) orders in a timely manner. KPMG Consulting updated Exception 130 to reflect the additional failures. As a result, Service Representatives were trained.</p> <p>During the second retest, KPMG Consulting reviewed 70 CNs from April – May 2002. BellSouth provisioned 68 (97%) orders in a timely manner. Based on these results, Exception 130 was closed.</p>
End-to-End Validation for Services and Features			
TVV4-28	BellSouth provisioned switch translations and	Not Satisfied	BellSouth does not provision switch translations and updates the CSRs in

Test Reference	Evaluation Criteria	Result	Comments
	updated customer service records in accordance with the submitted LSRs.		<p>accordance with the submitted LSRs.</p> <p>In the absence of a documented BellSouth standard for accuracy of provisioning, KPMG Consulting applied a benchmark of 95%.</p> <p>During initial testing, KPMG Consulting reviewed 22 orders to determine if the switch translations and CSRs were updated accurately. BellSouth provisioned 6 (27.2%) orders where switch translations and CRS were updated accurately. As a result, KPMG Consulting issued Exception 84 and Exception 112.</p> <p>KPMG Consulting verified BellSouth's response to Exception 112 and Exception 84. Based on BellSouth's response, KPMG Consulting conducted a retest.</p> <p>During retesting, KPMG Consulting reviewed 39 orders from December 2001– February 2002 to determine if the switch translations and CSRs were updated accurately. BellSouth provisioned 32 (82%) orders where switch translations and CSRs were updated accurately. KPMG Consulting updated Exception 112 and Exception 84 to reflect the additional failures.</p> <p>During the second retest, KPMG Consulting reviewed 51 orders from April 2002 – May 2002 to determine if the switch translations and CSRs were updated accordingly. BellSouth provisioned 41 (79%) orders where switch translations and CSRs were updated accurately. KPMG Consulting updated Exception 112 and Exception 84 to reflect the additional failures.</p> <p>KPMG Consulting closed Exception 112 (see criterion TVV4-24). Based on these results, Exception 84 remains open.</p>
TVV4-29	BellSouth provisioned directory listings and updated the customer service records in accordance with the submitted LSRs.	Not Satisfied	<p>BellSouth does not provision directory listings and update the CSRs in accordance with the submitted LSRs.</p> <p>In the absence of a documented BellSouth standard for accuracy of provisioning, KPMG Consulting applied a benchmark</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>of 95%.</p> <p>During initial testing, KPMG Consulting reviewed 16 orders from April – October 2001 to determine if the directory listings and CSRs were updated accurately. BellSouth provisioned 10 (62.5%) orders where directory listings and CSRs were accurately updated. As a result, KPMG Consulting issued Exception 112.</p> <p>KPMG Consulting verified BellSouth's response to Exception 112. KPMG Consulting conducted a retest.</p> <p>During retesting, KPMG Consulting reviewed 25 orders from December 2001– February 2002 to determine if the directory listings and CSRs were updated accurately. BellSouth provisioned 20 (80%) orders where directory listings and CSRs were updated accurately. KPMG Consulting updated Exception 112 to reflect the additional failures.</p> <p>During the second retest, KPMG Consulting reviewed 105 orders from April – May 2002. BellSouth provisioned 83 (80%) orders accurately. Exception 112 was amended to reflect these findings. KPMG Consulting closed Exception 112 (see criterion TVV4-24). Exception 171 was issued to address these additional discrepancies.</p> <p>Based on these results, Exception 171 remains open.</p>
ADSL Line Sharing			
TVV4-30	BellSouth provisions ADSL line sharing circuits according to documented M&P tasks.	Satisfied	<p>BellSouth provisions ADSL line sharing circuits according to documented M&P tasks.</p> <p>In the absence of a documented BellSouth standard for accuracy of provisioning, KPMG Consulting applied a benchmark of 95%.</p> <p>KPMG Consulting observed Bellsouth technicians install 158 commercial ADSL Line Sharing circuits (862 tasks) from January 8, 2001 to May 9, 2001. BellSouth provisioned 857 tasks (99.4%) in accordance with BellSouth</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>December 2001 to determine if BellSouth updated the Loss of Line report in a timely manner. BellSouth updated 323 (71%) commercial entries on the Loss of Line report in a timely manner. As a result, KPMG Consulting issued Exception 158.</p> <p>As a result of this Exception, BellSouth updated the ALEC web site to accurately reflect the time interval for the posting of an entry to the Line Loss Report. Based on the time interval changes, KPMG Consulting analyzed 451 commercial entries from December 2001. BellSouth updated 438 (97%) entries to the Line Loss Report in a timely manner. Based on these results, Exception 158 was closed.</p>

5.0 Parity Evaluation

A parity evaluation was not required for this test.

6.0 Final Summary

This section summarizes the number of test evaluation criteria discussed above and the number that was satisfied or not satisfied at the conclusion of this test.

6.1 Summary of Findings

There were 40 evaluation criteria considered for the Provisioning Verification and Validation (TVV4) test. Twenty-nine evaluation criteria received a satisfied result. Four criteria received a not satisfied result. Seven evaluation criteria remain under test at the time of this draft publication. It is KPMG Consulting's opinion that significant issues remain unresolved in the TVV4 testing area.

ATTACHMENT 31

JOINT DECLARATION OF JAY M. BRADBURY
AND SHARON E. NORRIS

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Joint Application by BellSouth Corporation)	
BellSouth Telecommunications, Inc.,)	CC Docket No. 01-277
and BellSouth Long Distance, Inc. for)	
Provision of In-Region, InterLATA Services)	
in Georgia and Louisiana)	

**DECLARATION OF SHARON E. NORRIS
ON BEHALF OF AT&T CORP.**

1. My name is Sharon E. Norris. My business address is P.O. Box 658, Loganville, Georgia 30052. I have been employed in the telecommunications industry for over twenty-seven years. I currently serve as a consultant with SEN Consulting. In that capacity, I have monitored and analyzed, on an ongoing basis, BellSouth's compliance with its obligations to provide AT&T nondiscriminatory access to BellSouth's Operations Support Systems ("OSS").

2. I previously have been employed by both AT&T and Southern Bell. Prior to retiring from AT&T in 1998, I had been an employee there since 1983, a member of its Law and Government Affairs Division since 1991, and AT&T's representative to the Georgia Public Service Commission ("Georgia PSC") since 1995. From 1973 until 1983, I held various positions in Southern Bell's business offices, business marketing organizations, retail stores, and support staff organizations. I received a degree in Distributive Education from DeKalb College in 1972.

3. As AT&T's representative to the Georgia PSC, I advocated AT&T's position on issues relating to opening Georgia's local exchange markets to competition. Beginning in 1997, I also began to monitor and analyze BellSouth's compliance with its OSS obligations throughout its nine-State region, a responsibility I continued to maintain when I retired from AT&T.

4. I have had extensive involvement in the State proceedings in BellSouth's region relating to the development, testing, and evaluation of BellSouth's OSS and other subjects. I have appeared in state workshops in Alabama, Florida, Georgia, Kentucky, Louisiana, North Carolina, South Carolina, and Tennessee that covered a wide range of topics including OSS, performance measures, and third-party testing. I also have testified before the Alabama and South Carolina Public Service Commissions. I have participated in meetings with the Federal Communications Commission (the "Commission") and the Department of Justice on these same issues. I also filed an affidavit with the Commission on behalf of AT&T in Docket 97-231 and have filed affidavits and testimony with state commissions.

Introduction

5. In this declaration, I will address the third-party testing that has been conducted to date by KPMG Consulting, Inc. ("KCI") on BellSouth's OSS. That testing, while not yet complete, already demonstrates that BellSouth does not provide nondiscriminatory access to OSS, and that serious deficiencies in its systems have yet to be remedied.

6. BellSouth has asserted that its systems are "regional in nature" and that it "uses essentially the same OSS" throughout its nine States. BellSouth Br., pp. 4, 53. The declaration of Jay Bradbury submitted by AT&T in this proceeding explains our basis for questioning aspects of that claim. If BellSouth's claim of regionality is accurate, however, then that merely

underscores that the third-party testing evidence pertinent to this proceeding must consist of all third-party testing evidence throughout BellSouth's region. Such testing has been conducted in two States -- Georgia and Florida. Thus, while BellSouth has sought to rely for third-party test data exclusively on the test conducted in Georgia, the third-party testing conducted in Florida -- of what BellSouth asserts to be the same systems -- is at least as material as the Georgia test to any assessment of BellSouth's OSS, to the extent BellSouth relies on the regionality of its systems to obtain Section 271 relief.

7. As I will show, however, the Florida testing is in fact *more* material. Even the most preliminary review of the Georgia and Florida results to date would reveal a stark and striking fact: although BellSouth asserts it largely (but concededly not completely) satisfied the Georgia test, the Florida test has discovered a substantial number of highly significant OSS deficiencies across a range of major areas of examination, and is continuing to discover significant such deficiencies on an ongoing basis -- months after the Final Report of the Georgia test was issued.

8. The reason for this seeming discrepancy is not difficult to determine. Florida is conducting a substantially more comprehensive, rigorous and independent test. Most of the issues on which Florida is uncovering problems are not issues on which BellSouth's systems *satisfied* the testing in Georgia, but rather are issues that simply were never tested in Georgia at all.

9. BellSouth asserts that not all third-party tests need to follow an identical "'cookie cutter' pattern," and that the substantial differences between the Georgia test results and the Florida test results do not "in and of themselves, make the Georgia test invalid." Stacy Aff., ¶ 598. That is of course true, but it misses the point. There is certainly no need for every State's

third-party test to be exactly the same. But when two States, testing what are alleged to be the same BellSouth systems, conduct tests of substantially different scope and character, that has at least two important implications for this Commission's analysis of the state of BellSouth's OSS.

10. First, the pool of evidence before the Commission in this proceeding includes all credible data from both tests. Such a broader factual record is particularly valuable where one test – in this case, Florida's – has been substantially more comprehensive and rigorous than the other. BellSouth acknowledges that "the scope of the Georgia test differs from the scope of the Florida test." Stacy Aff., ¶ 598. As a consequence, the features of the Florida test that were outside the scope of the Georgia test provide the Commission with the benefit of having evidence on matters on which there would otherwise be no third-party testing data at all. BellSouth has resisted addressing such evidence, and has attempted to dismiss the Florida test as irrelevant and to rely solely on the Georgia test. But if BellSouth's OSS really are regionwide, the fact that one test is from Georgia entitles it to no preferred status in this proceeding over a superior test from Florida in evaluating BellSouth's readiness for long-distance entry in Georgia and Louisiana.¹

11. Second, where instead an important feature of BellSouth's systems has in fact been tested by both States and seemingly different results have been reached, it then becomes necessary to attempt to determine the reason for the difference and to identify which results are more reliable. Indeed, in such instances, the fact that two separate tests have been conducted provides the Commission with an extremely useful means, by comparing the methods and results of the two, of identifying flaws that might have impaired either of the tests. For example, as I

¹ In that regard, although the Final Staff Recommendation in Louisiana found BellSouth's OSS to be regional in nature, it did not discuss any of the results of the Florida third-party test.

will discuss in more detail below, the volume testing in Georgia – which BellSouth is said to have “passed” – did not test the actual production environment in which real-world orders would actually be made and processed, but rather occurred almost exclusively within a special “test” environment that had enhanced capacity. BellSouth asserted that it had constructed that test environment so that the test results from that environment could nonetheless be presumed to apply to an actual production environment. But when volume testing was conducted in Florida in the actual production environment (as is done in every third-party test other than Georgia’s of which I am aware), BellSouth’s systems quickly failed to meet the standard even at the very lowest levels of volume. Those results demonstrate not only that BellSouth’s systems are not yet prepared to handle anticipated commercial volumes, but also that the presumption in Georgia that its test environment for the volume test actually mirrored the real-world environment was unwarranted.

12. The remainder of this declaration is divided into two parts. In Part I, I examine several areas of testing in which the available evidence from Florida, Georgia, or both demonstrates substantial deficiencies and failures in BellSouth’s systems that preclude a finding that BellSouth presently complies with the checklist. In particular, the third party testing has identified significant problems that have not yet been successfully addressed in the areas of volume testing, provisioning accuracy, change management, interface development, and billing.

13. In Part II, I compare more broadly the features of the two third-party tests – such as the degree of independence afforded the tester, the degree of participation by CLECs that was permitted, and, most fundamentally, their relative comprehensiveness and rigor. Such a comparison shows that the Florida test has been substantially superior to the Georgia test. Indeed, of the 94 open exceptions and observations in Florida as of October 5, 2001, 60 of those